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VIA PACER E-FILING

Hon. Arun Subramanian
 United States District Court
 Southern District of New York
 500 Pearl St.
 New York, NY 10007-1312

April 4, 2024

Re: Does vs. USVI, 1:23-cv-10301-AS

Dear Hon. Judge Subramanian, U.S.D.J.

I am counsel for Plaintiffs in the above matter. As such, I make two requests:

First, Plaintiffs request an extension of time to respond to the four motions to dismiss in this case, until May 8, 2024. Our office conferred, by phone and email, counsel in this case on April 3, 2024, and requested their consent to an extension of time to respond to the motions. Counsel for Ms. Plaskett has consented to an extension of four weeks as has counsel for John deJongh based on Plaintiffs' representation that no further extensions shall be granted. Other counsel have not yet responded.

Mr. DeJongh filed the first motion to dismiss, on January 21, 2024. On March 4, 2024, this Court granted Plaintiffs' request to file an omnibus opposition to all motions to dismiss and directed that said opposition be filed by April 11, 2024, two weeks after the fourth motion was filed. Thereafter, Defendants Government of the United States Virgin Islands, Attorney General Vincent Frazer and Governor Kenneth Mapp (collectively, "USVI") filed a motion to dismiss on March 8, 2024; defendant Cecile deJongh on March 15, 2024; and defendant Stacey Plaskett on March 28, 2024. In total, Plaintiffs must oppose four motions, totaling approximately 90 pages in length, on addition to the requests by Cecile deJongh and Governor deJongh to join in the arguments raised by the other motions.

Given the scope of the issues and lengthy arguments, Plaintiffs respectfully request an extension to May 8, 2024 to file an omnibus opposition and response to all motions to dismiss. While Plaintiffs have been working diligently on the motions as they have been filed, the motions raise numerous issues, both substantive and procedural. In order to meaningfully, but concisely respond, the additional time is warranted. Moreover, a substantial amount of time has been spent consulting Plaintiffs concerning certain arguments. In addition, lead trial counsel, Jordan Merson, Esq. is engaged on trial, starting April 8, 2024 in the case of *Virgil v. Metropolitan Transit Authority, Queens County, New York Supreme Court*, Index No. 705041/18.

It should be noted that Plaintiffs did not oppose Defendants' requests for an extension of time to file their motions to dismiss.

Second, Plaintiffs respectfully request leave to file a single 90-page Memorandum of Law to meaningfully respond to the three 20-page Memoranda of Law and one, nearly 40 page Memorandum of Law, filed on behalf of six defendants. Plaintiffs did not oppose the USVI's request for leave to file a 40-page Memorandum on behalf of three Defendants.

Thank you for your consideration.

Respectfully Submitted,

/s/ Jordan Merson

Jordan K. Merson